UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)

ECF Case

This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-CV-1076 (GBD)

The O'Neill Plaintiffs' Motion for Entry of Default Judgment Solely as to Liability Against the Publication Defendants

PLEASE TAKE NOTICE that upon the affidavit of Jerry S. Goldman, Esq., and the exhibits attached thereto, the *O'Neill* Plaintiffs, by and through their counsel, Anderson Kill, P.C., will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting the *O'Neill* Plaintiffs' motion for entry of default judgment solely as to liability against the defendants listed in Exhibit 1 to the affidavit of Jerry S. Goldman.

Dated: September 18, 2015 New York, New York

/s/ Jerry S. Goldman

Jerry S. Goldman, Esquire ANDERSON KILL P.C. 1251 Avenue of the Americas 42nd Floor New York, NY 10020 Attorneys for the O'Neill Plaintiffs